

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

E.W. by and through  
his guardian, RONNITA BRYANT,

Plaintiff,

V.

SECURITAS SECURITY SERVICES )  
 USA, INC., DETROIT PUBLIC SCHOOLS,) )  
 MYRON MONTGOMERY in his )  
 Individual capacity, and )  
 BROADUS WILKINS in His Individual )  
 Capacity, )

Defendant(s).

Civil Action No. 18-cv-12964

Hon. Arthur J. Tarnow  
Hon. Magistrate Judge  
R. Steven Whalen

**ERNST & MARKO LAW, PLC**  
Jonathan R. Marko (P72450)  
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**DETROIT PUBLIC SCHOOLS  
COMMUNITY DISTRICT  
OFFICE OF THE GENERAL  
COUNSEL**

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Detroit Public Schools, Broadus  
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**MYRON MONTGOMERY'S RESPONSE TO PLAINTIFF'S MOTION TO  
COMPEL DEPOSITION OF NAMED DEFENDANT MONTGOMERY**

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Now Comes Defendant Myron Montgomery, through his undersigned counsel, and in response states:

On July 3, 2019 Counsel for Defendant Montgomery agreed to provide a date certain for Myron Montgomery's deposition on receipt of a court order showing that Ronnita Bryant had the legal authority to act on behalf of the minor Plaintiff. (Exh 1, July 3, 2019 e-mail).

Later that day, Plaintiff's counsel provided Letters of Authority. Accordingly, that same day, Defendant's counsel offered July 16, 2019, 10:00 a.m. for Defendant Myron Montgomery's deposition. On July 8, 2019, Plaintiff's counsel agreed to that date, and has noticed the deposition for July 16, 2019 at 10:00 a.m. (Exh 2, Notice of Deposition of Myron Montgomery).

Wherefore, Defendant Montgomery respectfully requests Plaintiff's motion be denied.

Respectfully Submitted,

s/Theophilus E. Clemons  
THEOPHILUS E. CLEMONS (P47991)  
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Montgomery, and Wilkins  
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**BRIEF IN SUPPORT**

Defendant Montgomery relies on his motion, the exhibits attached thereto, and the discretion of this Honorable Court.

WHEREFORE, Defendant Montgomery respectfully requests that Plaintiff's motion be denied.

/s/Theophilus E. Clemons  
THEOPHILUS E. CLEMONS (P47991)  
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2019, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record.

/s/Theophilus E. Clemons  
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